



To: Shawn Ghose, EPA, RPM Star Lake Canal NPL Site

From: Michael Smith on behalf of Federal and State Natural Resource Trustees

Date: May 3, 2012

Re: Star Lake Canal Superfund Site, Jefferson County
Comments on the April 16, 2012 *Draft Feasibility Study Report*

Cc: Larry Champagne, Jessica White, Tommy Mobley, Don Pitts, Andy Tirpak, Chip Wood, Clare Lee, Barry Forsythe, Kenneth Shewmake, Phillip Winsor

The Trustees appreciate the opportunity to coordinate with you on the above-referenced document submitted electronically by Conestoga-Rovers & Associates. The Natural Resource Trustees would like to provide the following comments on this document. Please let me know if there are any questions.

General Comments

1. During previous conference calls and discussions during the Remedial Investigation (RI) phase for this site, it was the Trustees understanding that all or a portion of the spoil pile would be excavated as this Area of Interest (AOI) represents a potential current source area. The selected remedial alternative in the Draft Feasibility Study Report calls for a composite cap as a form of containment for COCs within the media at this location without excavation. Understanding the difficulties of excavation over the pipeline servitude, at a minimum, it would seem reasonable and effective to excavate the "mounds" at the spoil pile down to grade with the surrounding elevations, level and then install the composite cap.
2. Several of the remedial alternatives propose a removal/disposal excavation depth of 12 inches. Please provide supporting documentation and/or the rationale to use this depth. Is this an appropriate depth to apply uniformly to all AOI's across the site? Please explain.
3. Monitored Natural Recovery (MNR) was selected for the waterways and wetlands of Molasses Bayou. This was an appropriate choice given the sensitivity of that habitat to impacts from heavy machinery and traditional remediation techniques. However, this alternative does leave in place elevated levels of contaminants in some areas. It is recommended that the monitoring should evaluate the progress of meeting the remedial goals, and that further remedial actions be considered if MNR does not result in meaningful progress towards that goal.

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